

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO**

IN RE: POLYURETHANE FOAM)	
ANTITRUST LITIGATION)	MDL Docket No. 2196

)	Index No. 10-MD-2196(JZ)
This document relates to:)	
)	Hon. Jack Zouhary
Factory Direct, Inc. v. The Carpenter)	
Co., et al.,)	
Case No. 1:11-pf-10011-JZ)	

**STIPULATION FOR DISMISSAL, WITHOUT PREJUDICE,
OF FACTORY DIRECT'S CLAIMS AGAINST
DEFENDANTS DOMFOAM AND VALLE FOAM**

In accordance with Rule 41 of the Federal Rules of Civil Procedure, Factory Direct (the "Plaintiff") and Defendants Domfoam International Inc. ("Domfoam") and Valle Foam Industries (1995) Inc. ("Valle Foam") stipulate and agree to the dismissal, without prejudice, of the Plaintiffs claims against Defendants Domfoam and Valle Foam with each side bearing their own attorneys' fees and costs. The Plaintiff and Defendants Domfoam and Valle Foam further stipulate and agree to this Court's continuing jurisdiction for purposes of enforcing the settlement between the Plaintiff and Defendants Domfoam and Valle Foam. This Stipulation of dismissal, without prejudice, is intended to be without prejudice to the Plaintiffs claims against any other Defendants or co-conspirators in the above-captioned case. A proposed Order of dismissal, without prejudice, accompanies this Stipulation as Exhibit "1."

Dated: March 27, 2012

Respectfully submitted,

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— and —

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CERTIFICATE OF SERVICE

I certify that on March 27, 2012, I caused a true and correct copy of the foregoing document to be filed and served electronically on counsel for the parties.

By: s/ David A. Elder